

REMARKS

Applicant respectfully requests reconsideration of the application.

Claims 1-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,790,703 to Wang in view of U.S. Patent No. 5,832,119 to Rhoads.

Applicant respectfully traverses the rejection of claims 1-13.

Claim 1

The combined teachings of Wang and Rhoads do not teach: “a halftone screen threshold analyzer for creating a target orientation signal by applying a halftone screen threshold mask to image data from a received image” as claimed. Wang teaches the use of a threshold mask as a “stochastic dithering screen” as cited at col. 7, lines 35-38. However, this stochastic dithering screen does not act as a halftone screen threshold analyzer because it does not create a target orientation signal as claimed.

Wang’s dithering screens are used to generate halftone images, not to create a target orientation signal. In particular, Wang uses two different screens to generate first and second images, respectively. These two different screens have portions that are conjugates of each other, and portions that are uncorrelated. When images created by these different screens are superposed, the parts generated from the screens that are conjugates of each other are correlated while the parts that are uncorrelated create a visible non-correlation, such that an authentication image becomes visible due to the contrast between the different parts. As taught in Wang, this visible authentication image becomes visible by superposing the images generated with the different screens, not by applying a halftone screen threshold mask.

While Rhoads does teach forms of correlation, it does not teach the elements missing from Wang. Therefore, the combined teachings of Wang and Rhoads do not teach all of the elements of claim 1.

Claims 2-4 are patentable for the same reasons as claim 1.

Claim 5

The combined teachings of Wang and Rhoads do not teach: "applying a halftone screen to the image to create a target orientation signal" as claimed. Wang applies a halftone screen to generate a halftone image, not to create a target orientation signal as claimed.

Claims 6-8 are patentable for the same reasons as claim 5.

Claims 9-12

Regarding claims 9-12, Applicant respectfully disagrees with the Examiner's position that Rhoads teaches: "the halftone screen being formed such that application of the halftone screen to the halftone image produces an orientation signal from which geometric distortion of the halftone image is derived" as claimed. The Examiner cited, in part, Rhoads teachings regarding the use of quasi-rotationally symmetric universal codes as allegedly teaching this aspect of claims 9 and 12. However, the cited passages from Rhoads are silent with respect to teaching: "application of the halftone screen to the halftone image produces an orientation signal" as claimed. As noted by the Examiner, Wang is also silent about this aspect of claims 9 and 12. Therefore, the combined teachings of Wang and Rhoads fail to teach all of the elements of claims 9-12.

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Respectfully submitted,

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